

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

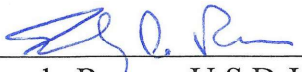
MEMO ENDORSED

August 11, 2020

By ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

The Government is directed to respond to this request by August 12, 2020.
SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: August 11, 2020
New York, New York

**Re: United States v. Doran Santiago Ramos
20-CR-4 (ER)**

Dear Judge Ramos:

I write to respectfully request that the Court modify Mr. Doran Santiago Ramos's bail conditions to remove the condition of home detention and electronic monitoring, and permit Mr. Ramos to travel domestically for work with advance permission from pretrial services.

This Court placed Mr. Ramos on home detention on May 22, 2020. According to Mr. Ramos's pretrial services officer, Mr. Ramos has been compliant with the strict conditions of home detention. Mr. Ramos will be starting a new job on August 15, 2020, with Clothes Minded Group (CMG). CMG is a company based in the United Kingdom and the United States that focuses on producing fashion focused events and connecting fashion brands to retail stores. Mr. Ramos will be assisting with media outreach and marketing in the United States. His work will require domestic travel beginning this month. Removing the condition of home detention and electronic monitoring will facilitate Mr. Ramos's transition back to work and will allow him to work with new clients and colleagues without the stigma of an ankle bracelet. Mr. Ramos also seeks removal of the electronic monitor in time for an upcoming medical appointment. Mr. Ramos has a MRI scheduled for August 13, 2020. *See Exhibit A*. Mr. Ramos cannot wear an electronic ankle monitor while undergoing the MRI. Therefore, we ask that the electronic monitor be removed in time for the MRI.

Finally, Mr. Ramos also requests modification of his bail to allow for temporary work related travel with advance permission from pretrial services. Mr. Ramos would submit a schedule for work-related travel and information on lodging and travel arrangements to pretrial services.

The government has not yet responded to a request for its position on this modification. Mr. Ramos's pretrial officer, John Moscato, objects to removing the home detention requirement because of Mr. Ramos's violation in March, but acknowledges that Mr. Ramos has been doing well under his supervision since his release from the MCC.

Respectfully submitted,

/s/
Zawadi Baharanyi
Assistant Federal Defender
212-417-8735

cc: Brett Kalikow
Assistant United States Attorney
(by ECF)